

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

V.

**GREGORY DAVID PARIS and
BARRINGTON ASSET MANAGEMENT, INC.**

Defendants.

Case No. 21 cv 3450

Judge Joan B. Gottschall

NOTICE CONCERNING DECLARATION OF PESACH GLASER

Plaintiff United States Securities and Exchange Commission respectfully submits this notice to the Court and counsel for Defendants Barrington Research Associates, Inc. and Gregory Paris concerning certain inaccuracies in the Declaration of Pesach Glaser, which was submitted in support of the SEC's Response to Defendant's Rule 56.1 Statement of Undisputed Material Facts. (Dkt 88, 90-7.) The SEC hereby provides notice of the following:

1. On March 4, 2024, the SEC filed its response to Defendants Barrington Asset Management Inc. and Gregory Paris’s Motion for Summary Judgment. (Dkt 85.) The SEC also filed its Response to Defendants’ Rule 56.1 Statement of Undisputed Material Facts, (Dkt 88), its Rule 56.1 Statement of Additional Material Facts, (Dkt 89), along with supporting documents and testimony transcripts, (Dkt 90).

2. In support of those filings, the SEC submitted the Declaration of Pesach Glaser (the “Declaration”). (Dkt 90-7.) Mr. Glaser is an accountant with the SEC’s Division of Enforcement.

Id. at ¶ 3. In the Declaration, Glaser summarized the contents of certain voluminous records, including trade data and written trade tickets. *Id.* ¶¶ 9–11.¹

3. Recently, in the course of preparing for the discovery that this Court permitted related to the Declaration, counsel for the SEC became aware of certain inaccuracies in Paragraph 2 of the Declaration. *Id.* ¶ 2.

4. First, the Declaration stated that Mr. Glaser received “an MBA in accounting from Northwestern Kellogg Graduate School of Management.” *Id.* In fact, Mr. Glaser received a Master of Management degree, not a Master of Business Administration degree, from Northwestern University Kellogg School of Management.

5. Second, the Declaration stated that Mr. Glaser is “a certified public accountant licensed by the State of Illinois.” Although Mr. Glaser completed the certified public accountant exam, possesses a certified public accountant certificate issued by the University of Illinois in 1984, and was an Illinois-licensed certified public accountant from January 1985 to September 1990 and an Illinois-registered certified public accountant from June 2008 to September 2009, he is not currently licensed as a certified public accountant by the State of Illinois.

6. The SEC regrets the inaccuracies and apologizes both to the Court and Defendants for any inconvenience they have caused.

7. The SEC is not currently aware of any inaccuracies in the remaining portions of Mr. Glaser’s Declaration, but it is continuing to review the declaration and the circumstances that

¹ This Court denied Defendants’ motion for summary judgment on September 30, 2024. (Dkt. 105.) The Court stated that, in resolving Defendants’ motion, it did not rely on the paragraphs in the SEC’s statement of additional facts that cited Mr. Glaser’s Declaration and made no ruling about the admissibility of Mr. Glaser’s Declaration or testimony at trial. (Dkt. 109 at 14 n.2.)

led to these inaccuracies. The SEC is considering what, if any, steps it should take or propose to the Court and will file a status update with the Court within two weeks.

Dated: May 16, 2025

Respectfully submitted,

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION**

By: One of Its Attorneys
/s/ Jonathan S. Polish

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